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Hon. J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
Courtroom 706
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Lev Parnas respectfully moves for modification of the terms of his pre-trial release, to allow him to leave his home daily from 8:00 am to 5:00 pm, provided that he avoids airports, boat docks or train terminals. The requested modification would allow Mr. Parnas to participate in regular family activities with his wife and children, exercise, and be outside of his home during daylight hours.

I have spoken with Mr. Parnas' United States Pre-Trial Services Officer in the Southern District of Florida, Rick Sampson, who does not oppose this request. The Government, as it expressed at our status conference this past Monday, opposes any modification of release.

Currently, Mr. Parnas is under the strictest terms of house arrest. He is only permitted to leave home for court appearances, meetings with his counsel, and religious observances. It is noteworthy that, since the terms of his release were imposed in October, Mr. Parnas has visited counsel in New York, attended court appearances, and returned home without incident.

In addition to being in full compliance with all the terms of his release to date, USPTO Sampson further informs that Mr. Parnas is equipped with a GPS electronic monitoring ankle bracelet, which records his location at thirty-second intervals. If tampered with, the bracelet would immediately alert the Pre-Trial Services Office. Every activity he could possibly engage in is documented by the Government. Every traffic light he stops at, left or right turn he takes, and even the speed at which he drives would be monitored and recorded.

Given Mr. Parnas' unblemished record of compliance, and the position of his Pre-Trial Services Officer, it is respectfully submitted that the proposed modification to home detention with a curfew should be granted.

Thank you in advance for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy

cc: All Counsel (e-mail)
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